

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**[PROPOSED] ORDER GRANTING TRUSTEE'S MOTION TO STRIKE
THE NOTICES OF WITHDRAWAL OF CLAIM AND NOTICES OF WITHDRAWAL
OF OBJECTION TO DETERMINATION OF CLAIM FILED BY CHAITMAN LLP
AND DENTONS US LLP**

Upon consideration of the motion (the "Motion") [Docket No. __], by Irving H. Picard, trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") and the chapter 7 estate of Bernard L. Madoff ("Madoff") (collectively, "Debtor"), in the above-captioned SIPA liquidation proceeding seeking the entry of an order striking the notices of withdrawal of claim and notices of withdrawal of objection to determination of claim filed by Chaitman LLP and Dentons US LLP (collectively, the "Withdrawals"); and due and proper notice of the Motion having been given and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion as set forth herein is in the best interests of the Debtor, its estate,

creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Motion is granted to the extent provided herein; and it is further

ORDERED that the Withdrawals identified on the list annexed hereto as Exhibit A are stricken from the Court's docket and have no legal effect; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2018
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit A
Withdrawals

	Adv. Pro. No.	Claimants	Withdrawal Docket No.	Counsel
1.	10-04377	Carol Nelson Stanley Nelson	17682, 17733 ¹	Chaitman LLP
2.	10-04658	Carol Nelson	17683, 17734 ²	Chaitman LLP
3.	10-04898	Helene Saren-Lawrence	17684, 17732 ³	Chaitman LLP
4.	10-04332	Barry Weisfeld	17625	Dentons US LLP
5.	10-04390	Michael Mann and Meryl Mann	17630	Dentons US LLP
6.	10-04390	BAM LP	17623	Dentons US LLP
7.	10-04401	The Rose Gindel Revocable Trust Agreement	17634	Dentons US LLP
8.	10-04415	Barbara J. Berdon	17624	Dentons US LLP
9.	10-04486	Norma Shapiro Revocable Declaration of Trust	17633	Dentons US LLP
10.	10-04486	Trust U/W/O Philip L. Shapiro	17638	Dentons US LLP
11.	10-04486	Norma Shapiro (IRA)	17632	Dentons US LLP
12.	10-04861	Harold J. Hein Individual Retirement Account	17626	Dentons US LLP
13.	10-04882	Laura E. Guggenheimer Cole	17628	Dentons US LLP
14.	10-04921	Stanley T. Miller IRA	17635	Dentons US LLP
15.	10-04925	The Alvin Gindel Revocable Trust Agreement	17622	Dentons US LLP
16.	10-05209	Lapin Children LLC	17627	Dentons US LLP
17.	10-05236	The Toby T. Hobish IRA	17637	Dentons US LLP
18.	10-05236	LI RAM L.P.	17629	Dentons US LLP
19.	10-05384	The Neil Reger Profit Sharing Keogh	17631	Dentons US LLP

1. Carol Nelson and Stanley Nelson filed an identical Notice of Withdrawal of SIPC Claim in Adv. Pro. No. 10-04377 (SMB), ECF No. 95.

2. Carol Nelson filed an identical Notice of Withdrawal of SIPC Claim in Adv. Pro. No. 10-04658 (SMB), ECF No. 101.

3. Helene Saren-Lawrence filed an identical Notice of Withdrawal of SIPC Claim in Adv. Pro. No. 10-04898 (SMB), ECF No. 141.